

Arjun Vasan
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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Arjun Vasan,
Plaintiff,
vs.
Checkmate.com, Inc.,
(dba “Checkmate”),
Defendant.

Case No.: 2:25-cv-00765-MEMF-JPR

**REQUEST FOR JUDICIAL
NOTICE OF THE
NONEXISTENCE OF PRE-
MERGER EMPLOYMENT**

Plaintiff respectfully requests that the Court take judicial notice of the indisputable fact that he was never employed by Defendant Checkmate.com, Inc. prior to the closing of the merger agreement referenced in this action.

Judicial notice is appropriate under Fed. R. Evid. 201(b)(2) because this fact is not subject to reasonable dispute and is readily verifiable from Defendant’s payroll records, executed offer letters, and prior sworn filings.

1 This fact is confirmed by Defendant’s own records, the publicly verifiable timeline of events,
2 and sworn declarations submitted by both parties. Plaintiff’s employment with Checkmate began
3 only after the merger closed and was expressly conditioned on its completion. Defendant has not,
4 and cannot, identify any pre-merger employment relationship between Plaintiff and Checkmate.

5 Nonetheless, Defendant has argued that § 7.4 of the Merger Agreement applies only to “pre-
6 merger employment claims” (“Reply”, ECF No. 32 at 10:24–12:4)—a category which, by their
7 own admissions, does not apply to Plaintiff, as no such employment existed.

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9 Additionally, Defendant argues that Plaintiff’s reading of the Merger Agreement is strained. *Id.*

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12 Respectfully Submitted,

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15 **Dated:** Monday, April 23, 2025

16 By:

Arjun Vasan

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18 **Arjun Vasan**
19 Plaintiff In Pro Per
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